

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

STATUTORY REVIEW OF THE SYSTEM)
FOR REGULATING RATES AND CLASSES) Docket No. RM2017-3
FOR MARKET DOMINANT PRODUCTS)

**APPLICATION OF
ALLIANCE OF NONPROFIT MAILERS,
ASSOCIATION FOR POSTAL COMMERCE, AND
MPA—THE ASSOCIATION OF MAGAZINE MEDIA
FOR NONPUBLIC TREATMENT OF TWO DOCUMENTS**

(March 30, 2018)

Pursuant to Rule 3007.22, 39 C.F.R. § 3007.22, the undersigned parties apply for non-public treatment of two documents that the undersigned parties and three other parties (American Catalog Mailers Association, Inc., Data & Marketing Association, and Idealliance) are jointly filing with the Commission today: (1) the Reply Comments of these parties; and (2) Non-Public Library Reference ANM *et al.*-LR-RM2017-3/NP6.

The non-public material consists of Appendix B to the Reply Comments and the entire Library Reference. Both of these documents analyze financial information appearing in (1) Appendix A to the Postal Service's March 1, 2018 comments, and (2) a set of related documents produced by the Postal Service on March 18, 2018. *See* Notice of the United States Postal Service of Filing Non-Public Materials (March 16, 2018). The Postal Service contends that the latter documents should be treated as

non-public because they contain “forecasts of the Postal Service’s net losses and liquidity, based on projections of its revenue and expenses,” and an explanation of “the primary quantitative assumptions about volumes, prices, personnel expenses, and non-personnel expenses used to prepare” the financial forecasts. *Id.*, Attachment at 3. To preserve the Postal Service’s claim of confidentiality, we are likewise filing both Appendix B to our reply comments and Library Reference ANM *et al.*-LR-RM2017-3/NP6 (which contains the workpapers for Appendix B) under seal as non-public documents.

We are separately filing a public version of our reply comments from which the contents of Appendix B have been redacted. Because of the pervasiveness of the non-public information in Library Reference ANM *et al.*-LR-RM2017-3/NP6, a redacted version of it would be largely unintelligible, and we have not prepared one.

Respectfully submitted,

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